

**REMARKS**

Claims 1-4 and 6-9 have been rejected under 35 USC 103(a) as unpatentable over Junqua in view of Shaw. The rejection is respectfully traversed.

Junqua discloses a method of minimizing the memory footprint of a system in which words are added to a vocabulary stored in a mobile telephone. In Junqua, a “spelled word” is input into a mobile telephone device by either using a keypad or by speaking each letter separately. Each of the letters in the spelled word is then converted into several phonetic transcriptions, and each phonetic transcription is assigned a likelihood of being the correct transcription based on the transcriptions of the surrounding letters and their likelihood. The transcriptions are then analyzed to determine which combinations of transcriptions are most likely to be correct (col. 3, line 37-57). These combinations are then converted into hybrid unit transcriptions using syllabic transcription such that each word is broken down into commonly used syllables and combinations of demi-syllables and phonemes that are used to form less common syllables. Junqua then assigns a predetermined code number to each of the syllables, demi-syllables and phonemes that are represented, such that only a minimal amount of memory is taken to store multiple phonetic representations of the input word.

The Examiner, in Response to Arguments on page 5 of the Office Action, states that “Applicant’s arguments fail to comply with 37 CFR 1.111(b) because they amount to a general allegation that the claims define a patentable invention without specifically pointing out how the language of the claims patent distinguishes them from the reference.” Applicant’s respectfully disagree. The previously filed amendment clearly states which of the claimed features the applied prior art fails to disclose. For example, “Junqua does not perform a second conversion to help determine the accuracy of a first conversion.” In any event, Applicant’s hereby respond to the Examiner’s reasons for maintaining the rejection of record.

In Junqua, col. 3, lns. 37-57, the reference fails to disclose converting of an orthographic input into a phonetic transcription, as required by the claimed invention. Rather, Junqua discloses conversion of a spelled word by the user in one or more phonetic transcription; see specifically col.

3, lns. 37-39. More specifically, in col. 4, lns. 3-22 and 37-40; and col. 5, lns. 33-37, Junqua discloses converting a spelled word by the user in one or more phonetic transcriptions. However, there is no disclosure of converting an entered orthographic word in a phonetic transcription. In the claimed invention, the orthographic word is not entered by spelling, but rather entered by, for example, a keyboard. Additionally, at col. 3, ln. 38 to col. 4, ln. 37 and col. 7, lns. 8-65, Junqua discloses converting a spelled word by users in phonetic transcriptions (see, for example, Figure 2). There is, however, no disclosure of a second "conversion of phonetic words into simple graphemic script units[.]" as required by the claimed invention. For example, the applied reference does not disclose a conversion of a phonetic word such as "sh a xk sh i: rr a xk" in a simple graphemic script unit such as "sch a k sch i rak."

Shaw discloses converting of an inputted spelled word in a phonic transcription that corresponds to the spelled word input, where the phonetic transcription is segmented into syllabic portions. In the claimed invention, on the other hand, there is no inputted spelled word. Rather, in the invention, the second converting of the phonemic words into simple graphemic script units is because the simple graphemic script units are distinct from syllabic portioned phonic transcriptions, as described above.

Since neither Junqua nor Shaw disclose first converting with inputted orthographic words and a second converting of phonetic words into simple graphemic script units, claims 1-4 and 6-9 are patentable.

Claim 5 has been rejected under 35 USC 103(a) as unpatentable over Junqua in view of Shaw, further in view of Molnar. The rejection is respectfully traversed for at least the same reasons presented in the arguments above.

In view of the above, each of the presently pending claims in this application is believed to be in immediate condition for allowance. Accordingly, the Examiner is respectfully requested to withdraw the outstanding rejection of the claims and to pass this application to issue. If it is

determined that a telephone conference would expedite the prosecution of this application, the Examiner is invited to telephone the undersigned at the number given below.

In the event the U.S. Patent and Trademark office determines that an extension and/or other relief is required, applicant petitions for any required relief including extensions of time and authorizes the Commissioner to charge the cost of such petitions and/or other fees due in connection with the filing of this document to Deposit Account No. 03-1952 referencing docket no.449122019600. However, the Commissioner is not authorized to charge the cost of the issue fee to the Deposit Account.

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Respectfully submitted,

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